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BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

RECEIVED

FEB - 6 2006

Federal Communications Commission
Office of Secretary

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

**Winn Telephone Company
Winn Telecom**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary

Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)

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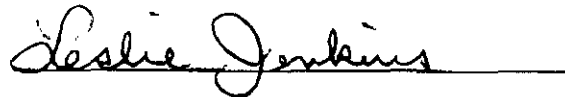
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**Winn Telephone Company
Winn Telecom**

2766 W. Blanchard Rd., P.O. Box 367, Winn, MI 48896 (989) 866-2211

CERTIFICATION

I am an officer for the above listed companies ("Companies") On behalf of the Companies, I hereby certify that I have personal knowledge that the Companies are in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.¹ Accompanying this certificate is a statement explaining how the Companies are in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Leslie Jenkins
CEO
Winn Telephone Company
Winn Telecom

February 6, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

Winn Telephone Company

Winn Telecom

Mt. Pleasant, Michigan

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Winn Telephone Company and its affiliate Winn Telecom (collectively "the Company" or "Company") is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has informed employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

2. Customer Notification and Authorization Process

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the Section 64.2007(f)(2).

3. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

4. Record Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

5. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.